

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

AMERICAN MANUFACTURERS MUTUAL  
INSURANCE COMPANY,

Plaintiff,

vs.

TOWN OF NORTH BROOKFIELD,

Defendant.

Civil Action No. 03-40266-CBS

STIPULATION AS TO RESOLUTION OF  
PLAINTIFF'S MOTION FOR PROTECTIVE ORDER

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The parties hereby agree and stipulate that the Motion for Protective Order previously filed by Plaintiff, American Manufacturers Mutual Insurance Company ("AMMIC") (document number 23 on the docket), be resolved as follows:

1. AMMIC will produce to the Defendant, Town of North Brookfield (the "Town"), certain publicly available documents that AMMIC has previously filed with the Illinois Department of Insurance agreed upon or to be agreed upon between counsel.
2. The Town withdraws its outstanding requests for discovery concerning AMMIC's run-off plan and other financial information about AMMIC, and will not pose questions, in forthcoming depositions, about (a) AMMIC's financial condition except to discover the extent, if any, to which such financial condition is contained in documents produced pursuant to paragraph 1 above and may affect AMMIC's handling of the bond claim that is the subject of this suit; or (b) the specifics of the run-off plan.

3. Nothing in this Stipulation shall constitute a waiver of any objection to any specific deposition question.

**TOWN OF NORTH BROOKFIELD**

By its attorneys

**KOPELMAN AND PAIGE, P.C.**

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**AMERICAN MANUFACTURERS MUTUAL  
INSURANCE COMPANY**

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Dated: May 6, 2005

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